

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT SEP 11 2018

for the

Southern District of Texas

Clerk of Court

United States of America

v.

Jose MORENO
YOB: 1988
USC

SEALED

Case No.

M-18-1914-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 9, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. § 846, 841(a)(1)

Offense Description

Conspiracy to Possess with Intent to Distribute more than 500 grams of cocaine.

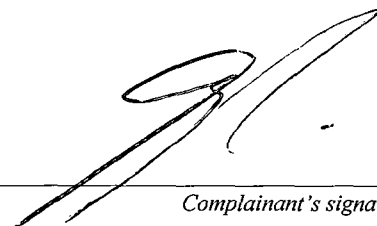
This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved:

Robert Wills & AUSA
9/11/2018



Complainant's signature

Steven Picone, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

9/11/18

City and state:

McAllen, Texas



Judge's signature

J. Scott Hacker, United States Magistrate Judge

Printed name and title

Attachment "A"

In March 2018, DEA McAllen Agents began investigating the Jose MORENO a/k/a "PEPO" Drug Trafficking Organization (DTO). On May 9, 2018, at approximately 10:01 a.m., while monitoring MORENO's telephone (956-250-4675), DEA McAllen Agents intercepted a telephone call between MORENO and FNU LNU a/k/a "TONY". During the telephone call, "TONY" advised MORENO that his fiends (unknown) had the order for the cocaine. MORENO asked "TONY" if there was one (1) or two (2) kilograms and "TONY" advised that they had two (2), but MORENO advised that he probably only needed one (1) kilogram of cocaine. After MORENO agreed to look at the cocaine, "TONY" provided MORENO with turn-by-turn directions to the location MORENO needed to go. On that same date, at approximately 10:41 a.m., Agents intercepted a telephone call between MORENO and "TONY" where both parties advised they were on their way. At approximately 11:03 a.m., Agents intercepted a telephone call where MORENO advised he was outside and "TONY" advised he was already at the location.

Based on the directions provided to MORENO by "TONY", Agents established surveillance in the area. At approximately 11:04 a.m., Agents observed a silver Ford F-150 pick-up truck MORENO's Dodge Charger (Texas license plates 55N7388) parked in the area of 3113 Arcola Lane, Edinburg, Texas 78542. Furthermore, Agents observed a pearl colored Cadillac Escalade bearing Texas license plates FHL-8481 parked in front of the residence at 3113 Arcola Lane. At approximately 11:28 a.m., Agents observed two (2) males exit the residence carrying a white plastic bag. The two (2) males then got into a Cadillac Escalade and departed the location.

At approximately 11:30 a.m., Agents observed MORENO and an unknown male walking out of the property located at 3113 Arcola Lane. Agents observed MORENO carrying a white plastic bag before getting into the Dodge Charger and departing the area. At that time, DEA McAllen Agents contacted DEA Brownsville to advise that the Cadillac Escalade may be traveling to Brownsville, Texas since the license plates were registered in Brownsville, Texas. Brownsville Police Officers located the Cadillac Escalade and attempted to conduct a traffic stop, but the driver led Officers on a pursuit. Once the vehicle came to a stop, the driver, Oscar Enrique IRACHETA and passenger, Jose Florentino GARCIA, were arrested. Officers seized one (1) bundle of cocaine, from IRACHETA and GARCIA, weighing approximately 1.09 kilograms and \$18,800.00 USC.

During a search of GARCIA's phone, Officers observed a photograph of two (2) kilograms of cocaine on the cellphone. GARCIA advised Officers that he and IRACHETA picked up the two (2) kilograms of cocaine at a residence and sold one (1) kilogram of cocaine to someone at the residence. GARCIA advised that he and IRACHETA received \$18,500.00 USC for the sale of the kilogram of cocaine.